

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

MOHAMMAD IBRAHIM BAZZI,

Defendant.

FACTUAL ALLEGATIONS
IN SUPPORT OF JUDICIAL REMOVAL

Criminal Docket No. 23 CR 41 (DLI)

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NOTICE IS HEREBY GIVEN TO MOHAMMAD IBRAHIM BAZZI (“the defendant”) and to his attorneys of record herein, Joshua L. Dratel, Esq., and James Roth, Esq., that the United States of America alleges the following facts in support of the Notice of Intent to Request Judicial Removal:

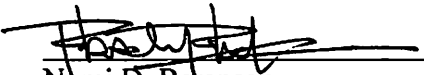
1. The defendant is not a citizen or national of the United States.
2. The defendant is a native of Lebanon and citizen of Lebanon and Belgium.
3. On or about April 25, 2023, the defendant was paroled into the United States for the purpose of criminal prosecution, pursuant to Section 212(d)(5) of the Immigration and Nationality Act of 1952, as amended, (the “INA” or the “Act”), 8 U.S.C. § 1182(d)(5).
4. At the time of sentencing in the instant criminal proceeding, the defendant will be convicted in the United States District Court, Eastern District of New York, of the following offense: Conspiracy to Conduct Unlawful Transactions Involving a Specially Designated Global Terrorist, in violation of 50 U.S.C. § 1705(a).
5. A total maximum sentence of 20 years’ imprisonment may be imposed for the above-mentioned offense.

6. The defendant is, and at the time of sentencing will be, subject to removal from the United States pursuant to Section 212(a)(7)(A)(i)(I) of the Act, 8 U.S.C. § 1182(a)(7)(A)(i)(I), as an immigrant who, at the time of application for admission, is not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Act, and a valid unexpired passport, or other suitable travel document, or document of identity and nationality as required under the regulations issued by the Attorney General under Section 211(a) of the Act.

WHEREFORE, pursuant to Section 238(c) of the Act, 8 U.S.C. § 1228(c), the United States of America requests that the Court order the defendant removed from the United States to Lebanon, and, in the alternative, to Belgium.

Dated: Brooklyn, New York
9/18/2024

BREON PEACE
United States Attorney
Eastern District of New York

By: 
Nomi D. Berenson
Robert M. Pollack
Jonathan P. Lax
Assistant United States Attorneys